

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

STEPHANIE NAGEL,
on behalf of plaintiff and a class,

Plaintiff,

vs.

BANK OF AMERICA, N.A.
and AMERICAN EDUCATION
SERVICES, INC.,

Defendants.

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13-cv-260

**PLAINTIFFS' MOTION TO ENTER AND CONTINUE
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

Plaintiff Stephanie Nagel respectfully request that the motion for class certification be entered and continued until the Court sets an initial status hearing in this matter.

In support of this motion, plaintiffs state as follows:

1. Plaintiff filed a complaint and motion for class certification on April 18, 2013, because of the decision in Damasco v. Clearwire Corp., 662 F.3d 891 (7th Cir. 2011).

2. Defendant Bank of America, N.A. and American Education Services, Inc. have not yet been served with either the complaint or the motion for class certification, and accordingly, have not yet appeared.

3. Therefore, plaintiff requests that the motion for class certification be entered and continued until the Court sets an initial status hearing in this matter.

WHEREFORE, plaintiff respectfully requests that her motion for class certification be entered and continued until the Court sets an initial status hearing in this matter.

Respectfully submitted,

s/Daniel A. Edelman
Daniel A. Edelman

Daniel A. Edelman

Cathleen M. Combs
James O. Lattuner
Tiffany N. Hardy
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(312) 419-0379 (FAX)

CERTIFICATE OF SERVICE

I, Daniel A. Edelman, hereby certify that on April 18, 2013, a true and accurate copy of the foregoing document was filed via the Court's CM/ECF system. The foregoing document will be sent to a process server to be served by hand delivery upon the following party, along with the summons and complaint in this matter:

JP Morgan Chase Bank, N.A.
100 East Broad Street
Columbus, OH 43125

National Collegiate Trust
466 Lexington Ave.
New York, NY 10017-3140.

s/Daniel A. Edelman
Daniel A. Edelman